

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

TAYLOR J. MYRICK;  
BRANDON HOWARD BIRD LYING  
DOWN;  
AMANDA LEIGH WILSON;  
CHRISTOPHER SHANE WOUNDED  
FACE;  
STACY ANN LOUISE LONE BEAR,  
a/k/a STACY ANN LOUISE WOUNDED  
FACE; and  
JACOB ORION YOUPEE

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(C), and 846; and 18 U.S.C. § 2

**COUNT ONE**

**Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone**

The Grand Jury Charges:

Beginning in or about 2016 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

TAYLOR J. MYRICK;  
BRANDON HOWARD BIRD LYING DOWN;  
AMANDA LEIGH WILSON;  
CHRISTOPHER SHANE WOUNDED FACE;  
STACY ANN LOUISE LONE BEAR,  
a/k/a STACY ANN LOUISE WOUNDED FACE; and  
JACOB ORION YOUPEE;

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and to possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone,

a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, pills containing a detectable amount of oxycodone, a Schedule II controlled substance, in and about the Fort Berthold Indian Reservation in North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;
5. It was further a part of said conspiracy that one or more conspirators transported others to meet sources of supply of oxycodone pills in other cities, including Minot, North Dakota;
6. It was further a part of said conspiracy that one or more conspirators allowed sources of supply of oxycodone pills to utilize residences located in and near

Parshall, North Dakota, and elsewhere, to possess, store, conceal, and distribute pills containing oxycodone, and to store and conceal the proceeds of pill distribution activity;

7. It was further a part of said conspiracy that co-conspirators would supply pills containing oxycodone pills to other co-conspirators for personal use when sources of supply of oxycodone pills were not readily accessible and available; and

8. It was further a part of said conspiracy that one or more conspirators possessed firearms to protect the conspirators' controlled substances and proceeds of distribution from theft, and to intimidate other persons;

In violation of Title 21, United States Code, Section 846; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Distribution of Oxycodone**

The Grand Jury Further Charges:

Beginning in or about 2016 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

TAYLOR J. MYRICK;  
BRANDON HOWARD BIRD LYING DOWN;  
AMANDA LEIGH WILSON;  
CHRISTOPHER SHANE WOUNDED FACE;  
STACY ANN LOUISE LONE BEAR,  
a/k/a STACY ANN LOUISE WOUNDED FACE; and  
JACOB ORION YOUPEE;

individually, and by aiding and abetting, knowingly and intentionally distributed a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Grand Jury Foreperson  
Foreperson

/s/ Christopher C. Myers  
CHRISTOPHER C. MYERS  
United States Attorney

RLV/tmg